

Testimony  
Before the Coast Guard and Maritime Transportation  
Subcommittee  
Transportation and Infrastructure Committee

United States House of Representatives

July 20, 2006 Hearing Regarding  
Coast Guard Licensing and Documentation

Mr. Shull Autin  
Chief Operating Officer, SEACOR Marine, LLC.  
Testifying on Behalf of the Offshore Marine Service Association

Good morning. Thank you for giving us the opportunity to testify today. My name is Shull Autin and I am the Chief Operating Officer of SEACOR Marine, LLC. SEACOR operates a worldwide fleet of offshore support vessels, tankships, harbor tug boats, and performs environmental spill response services.

I am also representing the Offshore Marine Service Association, the national trade association representing the owners and operators of vessels that support the offshore oil and gas sector, particularly in the Gulf of Mexico. Given the crucial role that OMSA members play in carrying supplies, equipment and workers to offshore facilities, we consider ourselves to be the lifeline of America's offshore energy supply.

### **Licensing/documentation is a critical part of maritime safety**

The topic of today's hearing is an important one for our industry. We share the Coast Guard's belief that the human factor is a critical factor in ensuring maritime safety. Our people are certainly the key to our company and our industry's record of safety. We are very careful about determining the crewmembers that we will entrust with a supply boat that is worth several million dollars. In fact it has been said that, in our industry, we want each of our vessel captains to feel like he or she is the CEO of his or her own multi-million dollar corporation. The licensing and documentation system is meant to help ensure that our mariners are qualified to take on that role.

It is very important that we not allow the process to become so complex and cumbersome that it hurts our ability to attract and retain qualified mariners. Unfortunately, we are perilously close to that being the case.

### **The licensing/documentation process has become more complex**

Over the past several years we have given our mariners more and more responsibility for safety, environmental stewardship and most recently security. Our industry supports all of these advances. But we must recognize that these new requirements have added to the complexity of the licensing and documentation system. And we have not put in place efficiencies or improvements to address those complexities.

### **The 2005 Hurricanes has resulted in extraordinary problems**

The licensing system was showing signs of this strain long before the hurricanes hit last year, but with those storms, the licensing process has become overstressed to the point of failure.

The Coast Guard has been very energetic in trying to address the problems caused by the loss of the New Orleans Regional Examination Center. They have had to move their offices, address staffing needs and work through problems created by the destruction of thousands of mariner files.

Unfortunately, ten months have passed since the hurricanes and the system is a long way from being fixed. And despite all of the Coast Guard's good work to overcome the problems caused by the hurricanes, our sense is that the RECs have not received the level of resources that they need to meet minimal levels of customer service for American mariners.

### **Industry is experiencing unacceptable delays**

Today, some OMSA members have boats tied to the dock because they cannot find qualified crews. The extraordinary delays in licensing and documentation are a large factor.

A survey of OMSA members produced reports that, from the point that the application process is started until the document is received, it may take between three and five months to process an entry-level Merchant Mariner Document or to receive an upgrade in a license. A renewal, which should be a much simpler process, can take from six weeks to four months. If the mariner has a medical condition and needs to seek a medical waiver, the renewal may take nine months to a year. Let me add that as the baby boomer generation ages and the average age of our senior captain increases, medical questions will become more common.

The negative impact of these types of delays on our industry is hard to calculate. Can you imagine telling an 18 year old to wait up to five months before coming to work? How can we possibly attract the best of the generation that is now entering the workforce with that sort of obstacle? And how do we tell a 30 year employee that he can't go to work because his license has expired?

### **The Coast Guard's reorganization should help in the long run**

We think the Coast Guard's plan to fix the licensing and documentation system through a large reorganization is necessary and shows great promise. If it is as successful, the improvements they have described are worth supporting.

But we also need to go into this with our eyes open. In the private sector, even the most successful reorganizations carry with them about six months of absolute chaos and heartbreak before the good results emerge. In mariner documentation, we don't have the luxury of time. The system is in a crisis today and none of us can afford to focus on the future improvements and ignore the problems that mariners face today. That argues that the Coast Guard needs to move on two paths – addressing the backlog today while it prepares for the future.

We have three suggestions that we think can help:

### **Expand the SEP**

First, expand a program called the Streamlined Evaluation Process or SEP. This was started as a pilot project at the Houston REC and has been very successful there. Under the SEP, companies take responsibility for making sure their mariners applications are error free and letter perfect before they are sent to the Coast Guard. The Coast Guard is able to expedite these applications and process them with a minimal amount of delay. One OMSA member reports that applications submitted through the SEP in Houston take less than a month to process and frequently as little as two weeks. We recommend that the Coast Guard expand this program to all processing centers nationwide.

### **Simplify the Application**

Second, simplify the application itself. The Coast Guard has reported that between 50 percent and 80 percent of all applications that come directly from mariners contain errors or omissions that can slow down the processing. Clearly, the industry needs to do what it can to cut down on mistakes, but if nearly eight out of ten mariners can't successfully complete the application, maybe the problem is with the application itself. It can be confusing and it can require information that the Coast Guard may not actually need to request from the mariner. To draw a comparison, if McDonalds found that most of their customers couldn't successfully order from the menu, they would probably change the menu. We think that streamlining and improving the application forms could quickly produce improvements in processing times.

### **Extend expiring renewals**

Third, the Coast Guard should take advantage of the ability to extend licenses and documents that you gave them as a part of the recently passed Coast Guard Authorization Bill. This would certainly keep mariners from losing the ability to work while their license renewal is being processed, which was the purpose of this change. But it will also help the entire licensing and documentation process because it will give the Coast Guard a little more breathing room as it works to reduce the backlog for other applications and to restructure its New Orleans REC.

### **TWIC may create additional problems**

Finally, I wanted to touch on the proposed rule for the Transportation Worker Identification Card. We are very concerned about the proposal. According to the proposed rule, mariners would be required to apply for and receive a TWIC before they even begin applying for a Coast Guard document. They would undergo two different background checks, make two applications, pay two fees and endure unnecessary delays. Let's remember that the TWIC program is to be implemented even as the Coast Guard reorganizes and relocates its documentation function to West Virginia. All the warning signs are there that this approach could be disastrous for the American mariner.

We would suggest a couple of approaches aimed at making the system work smoothly. First, Congress should mandate that mariners should only have to fill out one application form, undergo one background check and pay one reasonable fee.

Second, the implementation of TWIC should be phased in, based on actual risk. Let's remember that our licensed and documented mariners have already undergone a background check that is more complete and more rigorous than the one that would be required under TWIC. In as much as the Coast Guard is heading into what is likely to be a disruptive reorganization process, let's not put mariners in the first wave of the TWIC rollout. Let the Coast Guard work through the growing pains of the reorganization first and then require mariners to go through the TWIC process. This would have the added benefit of reducing the total number of American workers that would be in the initial implementation of TWIC.

To recap, we consider the Coast Guard to be our close partners in safety and we share their view on the importance of the licensing and documentation process in making sure that the U.S. mariner maintains the high level of professionalism and ability that has allowed us to operate safely and securely.

- Despite all of the effort that has gone into restoring service following the hurricanes, the documentation and licensing function continues to be plagued by delays and problems.
- The reorganization and restructuring of the National Maritime Center that the Coast Guard is now starting is needed and has our support, but close attention will need to be focused on the process to ensure that service to mariners does not suffer in the short term, even as improvements are implemented for the long term.
- A number of steps could help improve short term effectiveness, including expansion of the Streamlined Evaluation Process, simplifying applications and taking advantage of the new power granted by Congress to extend expiring licenses and renewals.
- The proposed plan for Transportation Worker Id Cards is of great concern to the entire maritime industry. We suggest that Congress mandate that there will be one application, one background check and one reasonable fee for both the TWIC and Coast Guard documents. We also urge the agencies to phase in TWIC so that the Coast Guard National Maritime Center reorganization can be successfully completed before mariners are required to obtain a TWIC. This can be done without threatening security because mariners already undergo a background check that is more thorough than the proposed TWIC process.

I very much appreciate having the opportunity to testify today and I would be happy to answer any questions.